



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

JRS/GK/DAS
F. #2021R00900

271 Cadman Plaza East
Brooklyn, New York 11201

July 13, 2023

By FedEx

Ronald Sullivan, Esq.
Ronald Sullivan Law PLLC
1300 I Street NW
Suite 400 E
Washington, DC 20005

Kenneth Jamal Montgomery, Esq.
198 Rogers Avenue
Brooklyn, New York 11225

Counsel for Ozy Media, Inc.

Counsel for Carlos Watson

Re: United States v. Carlos Watson and Ozy Media, Inc.
Criminal Docket No. 23-82 (EK)

Dear Counsel:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government hereby furnishes on the enclosed DVD a production of discovery in the above-captioned case, which is Bates-numbered EDNYOZY003408052 to EDNYOZY003416203. Passwords to the production and an index detailing the sources of the documents in the production, which is Bates-numbered USAO-EDNYOZY000000241, will be provided by email.

This discovery is being provided to you pursuant to the protective order entered by the Court on April 21, 2023, which was later signed by Mr. Sullivan on May 24, 2023. See ECF Dkt. No. 54.

The government renews its request for reciprocal discovery from the defendants. Please note that the defendants' obligations under Fed. R. Crim. P. 16(b) include identification of "all non-impeachment exhibits [the defendants] intend to use in their defense at trial, whether the exhibits will be introduced through a government witness or a witness called by a Defendant." United States v. Napout, No. 15-CR-252 (PKC), 2017 WL 6375729, at *7 (E.D.N.Y. Dec. 12, 2017); accord United States v. Smothers, No. 20-CR-213 (KAM), 2023 WL 348870, at *22 (E.D.N.Y. Jan. 20, 2023).

If you have any questions or requests regarding further discovery, please do not hesitate to contact us.

Very truly yours,

BREON PEACE
United States Attorney

By: /s/
Jonathan Siegel
Gillian Kassner
Dylan A. Stern
Assistant U.S. Attorneys
(718) 254-6293/6224/6213

Enclosure

cc: Clerk of the Court (EK) (by ECF) (without enclosures)